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7 COUNTY OF SANTA CLARA and its
8 SANTA CLARA VALLEY MEDICAL
CENTER, HOLLISTER BREWSTER, M.D.,
ALFONSO BANUELOS, M.D.,
DOLLY GOEL, M.D., and
PETER GREGOR, M.D.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(San Francisco)

14 THRESSA WALKER et al.,

No. 10-CV-04668 RS

15 || Plaintiffs,

**STIPULATION AND [PROPOSED] ORDER
STAYING NET-WORTH DISCOVERY**

16 | v.

17 COUNTY OF SANTA CLARA et al.,

Defendants.

20

21 The parties, through their respective counsel of record, hereby stipulate and agree to an order
22 staying Plaintiffs' proposed net-worth discovery respecting their punitive damage allegations against
23 Defendants Alfonso Banuelos, M.D., Dolly Goel, M.D., Hollister Brewster, M.D., and Peter Gregor,
24 M.D., until after the date by which all pretrial motions are to be heard (March 7, 2013). If deemed
25 necessary, Plaintiffs shall be permitted to conduct such limited discovery until March 29, 2013,
26 which should not delay the submittal of pretrial documents. This issue was discussed with United
27 States District Judge Richard Seeborg during the further case management conference on July 19,
28 2012. At that time, Judge Seeborg suggested that the parties consider entering into an appropriate

1 stipulation for submittal to Magistrate Judge Joseph C. Spero.

2 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
3 "conformed" signature (/S/) within this efiled document.

4 **LORI E. PEGG**
5 **ACTING COUNTY COUNSEL**

6 Dated: July 31, 2012

7 By: _____ /S/
8 GREGORY J. SEBASTINELLI
9 Deputy County Counsel

10 Attorneys for Defendants
11 COUNTY OF SANTA CLARA and its
12 SANTA CLARA VALLEY MEDICAL
13 CENTER, HOLLISTER BREWSTER, M.D.,
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15 DOLLY GOEL, M.D., and
16 PETER GREGOR, M.D.

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LAW OFFICES OF BONNER & BONNER

Dated: July 31, 2012

By: _____ /S/
CHARLES A. BONNER, ESQ.

Attorneys for Plaintiffs
GEETA SINGH, M.D., and KAI IHNKEN, M.D.

ORDER

IT IS SO ORDERED. Plaintiffs' proposed net-worth discovery respecting their punitive damage allegations against Defendants Alfonso Banuelos, M.D., Dolly Goel, M.D., Hollister Brewster, M.D., and Peter Gregor, M.D., shall be stayed until March 7, 2013. If deemed necessary, Plaintiffs shall be permitted to conduct such limited discovery until March 29, 2013.

Dated: August 1, 2012



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